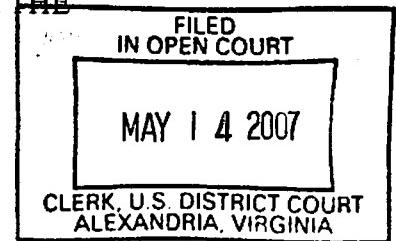


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA)
) Criminal No. 1:07cr140
v.)
)
) 18 U.S.C. §371
CHRISTOPHER E. EAVES,)
a/k/a "CEAVES") Conspiracy
) Count One
Defendant.)

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

Count One

1. Beginning in approximately 2000 and continuing until approximately May 2004, in the Eastern District of Virginia and elsewhere, CHRISTOPHER E. EAVES, also known as "CEAVES," defendant herein, conspired and agreed to willfully infringe copyrights with others known and unknown to the government, including but not limited to Mark Shumaker, also known by his screen nickname "MARKALSO"; that is, during a 180-day period, defendant did conspire and agree to reproduce and distribute at least ten infringing copies of one or more copyrighted works, with a total retail value of more than \$2,500, for purposes of private financial gain, in violation of Title 17, United States Code, Section 506(a)(1) and Title 18, United States Code, Section 2319(b)(1).

2. It was part of the conspiracy that the defendant and other members of the Internet music piracy group known as "Apocalypse Crew" (a/k/a "aPC") would obtain, rip (i.e., convert to computer format), and distribute copyrighted music files to group-affiliated Internet file storage sites (a/k/a "FTP Sites") throughout the world.

3. It was further part of the conspiracy that certain members of the conspiracy would operate and maintain group-controlled FTP sites containing thousands of unauthorized copies of copyrighted works, including software, games, movies, and music, for the reward and benefit of group members and others.

Overt Act

4. It was further part of the conspiracy that the following act in furtherance of and to effect the objects of the above-described conspiracy was committed in the Eastern District of Virginia:

- a. Mark Shumaker, the leader of aPC for some part of the Defendant's involvement in the group, used his access to the Fatal Error computer server, located at the computer facilities of an Internet Service Provider in the Eastern District of Virginia (specifically Dulles, Virginia) between on or about March 3, 2001 until on or about October 25, 2001, to reward members of aPC with infringed copyrighted works for their involvement in aPC.

(All in violation of Title 18 United States Code, Section 371).

Chuck Rosenberg
United States Attorney

By:


Jay V. Prabhu
Special Assistant United States Attorney